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4 Irvine, California 92620
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6 Attorneys for Chapter 7 Trustee,
ARTURO M. CISNEROS

7
8 UNITED STATES BANKRUPTCY COURT
9 CENTRAL DISTRICT OF CALIFORNIA - RIVERSIDE DIVISION

10 In re

11 SHAMICKA LAWRENCE,

12 Debtor.

Case No. 6:23-bk-15163-WJ

Chapter 7

13 NOTICE OF APPLICATION BY
CHAPTER 7 TRUSTEE TO EMPLOY
MARSHACK HAYS WOOD LLP AS
14 GENERAL COUNSEL

15 [NO HEARING REQUIRED]

16 TO THE HONORABLE WAYNE JOHNSON, UNITED STATES BANKRUPTCY JUDGE, THE
17 OFFICE OF THE UNITED STATES TRUSTEE AND ALL INTERESTED PARTIES:

18 PLEASE TAKE NOTICE that Arturo M. Cisneros, in his capacity as Chapter 7 Trustee
19 (“Trustee”) of the Bankruptcy Estate (“Estate”) of Shamicka Lawrence (“Debtor”), has filed an
20 application (“Application”) for entry of an order authorizing the employment of Marshack Hays
21 Wood LLP (“Firm”), as Trustee’s and the Estate’s general counsel in this case pursuant to 11 U.S.C.
22 § 327.

23 Trustee requires assistance of counsel to:

- 24 • Investigate, analyze, and advise on the Estate’s interest in Estate assets;
25 • To obtain any orders or judgments necessary to enforce and vindicate the Estate’s interest
26 in real and personal property assets;
27 • Investigate possible avoidance actions and litigation claims, including claims to deny the
28 Debtor’s discharge;

- Review the claims register and, if advisable, object to creditor claims, or negotiate with creditors and lienholders, where necessary.

In addition, the Firm may be required to assist Trustee in the following matters:

- To represent Trustee in any proceeding or hearing in the Bankruptcy Court and in any action where the rights of the Estate or Trustee may be litigated or affected;
- To conduct examinations of Debtor, witnesses, claimants, or adverse parties and to prepare and assist in the preparation of reports, accounts, applications, motions, complaints and orders; and
- To perform any and all other legal services incident and necessary for the smooth administration of this bankruptcy case.

The Firm will render services to Trustee at the Firm's regular hourly rates, which may be adjusted from time to time. The Firm's current hourly billing rates are as follows:

Partners	Rates	Of Counsel	Rates	Paralegals	Rates
Richard A. Marshack	\$690	Kristine A. Thagard	\$590	Pamela Kraus	\$290
D. Edward Hays	\$690	Matthew W. Grimshaw	\$590	Chanel Mendoza	\$290
David A. Wood	\$550	Chad V. Haes	\$550	Layla Buchanan	\$290
Laila Masud	\$460	Associates	Rates	Cynthia Bastida	\$290
		Tinho Mang	\$430	Kathleen Frederick	\$260
		Bradford N. Barnhardt	\$360		
		Sarah R. Hasselberger	\$340		

The Firm will be compensated from assets of the Estate, if any, and will not be compensated absent the Estate's receipt or recovery of such assets. The Firm has received no retainer for the services to be performed in this case and has agreed that no retainer will be paid. The Firm understands that its compensation in this case is subject to approval by the Bankruptcy Court. In compliance with 11 U.S.C. §§ 330 and 331, the Firm intends to file interim and final applications for allowance of fees and reimbursement of costs as and when appropriate. The Firm has advised the Trustee that the Firm has not shared or agreed to share any compensation to be received in this case with any other person, except among partners of the Firm.

Based on the foregoing, Trustee believes that the Firm is a "disinterested person" within the meaning of Bankruptcy Code § 101(14).

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1 The complete scope and terms of the employment are detailed in the Application a copy of
2 which can be obtained by contacting D. Edward Hays and Tinho Mang whose contact information
3 is listed in the top left-hand corner of this Notice. The Application is based on 11 U.S.C § 327 and
4 the Firm intends to seek compensation pursuant to 11 U.S.C. §§ 330 and 331.

5 PLEASE TAKE FURTHER NOTICE that any response and request for hearing as to the
6 proposed employment must be in the form as required by Local Bankruptcy Rules (“LBR”) 2014-
7 1(b), 9013-1(f) and (o) and filed with the Clerk of the above-entitled Court no later than fourteen
8 days (14) from the date of service of this Notice, plus an additional three days unless this Notice
9 was served by personal delivery or posting as described in F.R.Civ.P. 5(b)(2)(A)-(B). A copy of any
10 response must be served on D. Edward Hays and Tinho Mang at the address indicated above and
11 must also be served on the Office of the United States Trustee, 3801 University Ave., Suite 720,
12 Riverside, CA 92501. Failure to timely respond may be deemed as acceptance of the proposed
13 employment. *See*, LBR 9013-1(h).

14
15 DATED: December 14, 2023

MARSHACK HAYS WOOD LLP

16
17 By: /s/ D. Edward Hays
18 D. EDWARD HAYS
19 TINHO MANG
20 Attorneys for Arturo Cisneros,
21 Chapter 7 Trustee for the Bankruptcy Estate of
22 Shamicka Lawrence
23
24
25
26
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **NOTICE OF CHAPTER 7 TRUSTEE APPLICATION TO EMPLOY MARSHACK HAYS WOOD LLP AS GENERAL COUNSEL** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **December 14, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **CHAPTER 7 TRUSTEE ARTURO CISNEROS (TR):** Arturo Cisneros (TR) amctrustee@mclaw.org, acisneros@iq7technology.com; ecf.alert+Cisneros@titlexi.com
- **ATTORNEY FOR DEBTOR SHAMICKA LAWRENCE:** Marc A Lieberman marc.lieberman@flpllp.com, safa.saleem@flpllp.com, addy@flpllp.com
- **US TRUSTEE:** United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL:** On **December 14, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR
SHAMICKA LAWRENCE
11364 ESTATES COURT
RIVERSIDE, CA 92503

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **December 14, 2023**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

PURSUANT TO THE CENTRAL GUIDE SUPPLEMENT TO LBR 5005-2(d), SERVING A JUDGE'S COPY OF DOCUMENTS, §2.2(c), A NON-HEARING MOTION WHEN THE RESPONSE DEADLINE HAS NOT PASSED SHOULD NOT BE SERVED UPON THE JUDGE.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

December 14, 2023
Date

Chanel Mendoza
Printed Name

/s/ Chanel Mendoza
Signature

2. SERVED BY UNITED STATES MAIL: CONTINUED:

SECURED CREDITOR

MERCEDES - BENZ FINANCIAL
SERVICES
ATTN: BANKRUPTCY
PO BOX 685
ROANOKE, TX 76262-0685

SECURED CREDITOR

US BANK
ATTN: OFFICER, A MANAGING OR
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17245 LUVERNE PL
ENCINO, CA 91316-3933

CREDITOR

14652-8 VENTURA, LLC
ATTN: ROW ZADEH
14652 VENTURA BLVD
LOS ANGELES, CA 91403-3686

CREDITOR

ADT
ATTN: BANKRUPTCY
1501 W YAMATO RD
BOCA RATON, FL 33431-4438

CREDITOR

AMERICAN EXPRESS
C/O BECKET AND LEE
PO BOX 3001
MALVERN, PA 19355-0701

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215
LOS ANGELES, CA 90025-6588

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25134 RYE CANYON LOOP, #300
VALENCIA, CA 91355-5031

CREDITOR

BRIDGEPORT MARKETPLACE, LLC
ATTN: DALE DONOHOE
28338 CONSTELLATION ROAD,
SUITE 900
VALENCIA, CA 91355-5098

CREDITOR

CAPITAL ONE
ATTN: BANKRUPTCY
DEPARTMENT
PO BOX 5155
NORCROSS, GA 30091

CREDITOR

CAPITAL ONE
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PO BOX 30285
SALT LAKE CITY, UT 84130-0285

CREDITOR

CAPITAL ONE / NEIMAN MARCUS /
BERGDORF GOODMAN
ATTN: BANKRUPTCY
PO BOX 30285
SALT LAKE CITY, UT 84130-0285

CREDITOR

CHASE CARD SERVICES
ATTN: BANKRUPTCY
PO BOX 15298
WILMINGTON, DE 19850

CREDITOR

CITY OF LOS ANGELES, OFFICE
OF FINANCE
PO BOX 53233
LOS ANGELES, CA 90053-0233

CREDITOR

CITY OF LOS ANGELES, OFFICE
OF FINANCE
200 N SPRING ST, RM 101, CITY
HALL
LOS ANGELES, CA 90012-3224

CREDITOR

CITY OF VENTURA
BUSINESS TAX OFFICE
501 POLI ST, RM 107
VENTURA, CA 93001-2632

CREDITOR

COUNTY OF LOS ANGELES
DEPARTMENT OF TREASURER &
TAX COLLECTOR
PO BOX 514818
LOS ANGELES, CA 90051-4818

CREDITOR

CREDITORS ADJUSTMENT
BUREAU, INC
C/O KENNETH J FREED, ESQ
LAW OFFICES OF KENNETH J.
FREED
14226 VENTURA BLVD
SHERMAN OAKS, CA 91423-2715

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10940 WILSHIRE BLVD, SUITE 1600
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1 CENTURY DR, #32A
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NA SHAUN NEAL
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BOWER & ASSOCIATES, APLC
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C/O NICK BADII, ESQ
LAWYERS FOR EMPLOYEE &
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LLC
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261
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4861-9994-5111, v. 1